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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's	)	CC Docket No. 94-102
Rules to Ensure Compatibility	)	RM-8143
With Enhanced 911 Emergency	)	
Calling Systems	)	

TO: The Commission

COMMENTS OF AMERICAN PERSONAL COMMUNICATIONS

American Personal Communications ("APC")[1/] agrees with the primary objectives of the Commission expressed in the Notice of Proposed Rule Making (the "NPRM") released in this docket -- to ensure that the appropriate emergency service agency be able to handle any 911 call from any telephone. APC also agrees that subscribers to real-time voice services that are interconnected to the public switched telephone network should have access to advanced emergency response services that is comparable to that enjoyed by wireline service subscribers, with an appropriate understanding of the differences inherent in the nature of wireless communications.

As pointed out in various joint expert reports, both system enhancements and/or expansions are required by both emergency service systems and the wireless systems of today to meet the preliminary requirements defined by the emergency services agencies. Accordingly, industry standardization

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[1/] American PCS, L.P., d/b/a American Personal Communications.

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efforts are required to fully define these modifications and to ensure compatibility, interoperability and consistency among land-based systems, existing wireless systems, future wireless systems and emergency service systems. APC believes strongly that a mandatory milestone approach, as proposed in the NPRM, is an inappropriate method to set industry compliance in such a complicated, technical and systems-encompassing integration effort.

APC also believes that an evolutionary approach that assures close coordination among wireless and wireline operators and emergency services agencies, while coordinating research relevant to the different methods of providing accurate location information, is required. APC recommends that the Commission encourage all applicable industry bodies (i.e., standards organizations) to continue their work toward industry compatibility, utilizing a methodological standardization approach rather than an approach relying upon mandatory milestones.

I. 911 AVAILABILITY

APC believes that the term "availability" should be fully and carefully defined. The Commission must recognize that only terminal devices that are (1) in the service area, (2) are authorized to operate in the service area, and (3) are in operational condition (that is, unlocked, programmed and with an operational power source) can access 911 services. The rules should exempt phones that have been legitimately

denied access to the underlying network (for reasons of, for example, system interference or fraudulent utilization measures).

APC agrees with PCIA that wireline infrastructure must be in place to support and respond to calls from the wireless terminals of today. The infrastructure not only includes the wireless infrastructure, but encompasses the technology, infrastructure and protocols that are required to transmit all pertinent information required by the emergency agency.

II. GRADE OF SERVICE

APC believes that it is the common goal of the industry to minimize the number of blocked calls to emergency service systems. For this reason, APC believes that federal regulatory intervention is not required at this time. Network design, to ensure adequate capacity to support a quality grade of service, can be accomplished through cooperative efforts between responsible service providers and users.

III. 911 CALL PRIORITY

Call priority is an extremely important aspect of wireless access to enhanced 911 services. Emergency calls should have a priority over non-emergency calls. Standards activities by industry experts are required to investigate various priority algorithms, such as call queuing and call throttling, and their implementation and impact on systems currently being developed and deployed.

Call prioritization means more, however, than simply identifying the occurrence of 911 calls and granting them priority over non-emergency calls. There must be some method or algorithm of call prioritization even for emergency calls that originate from different geographic locations within a defined system. In other words, if multiple 911 calls (which may relate to the same incident) are queued from a certain geographic area and another 911 call comes into the mobile switching center from a totally different area, the system should recognize this case and insert the new call into the queue in a higher priority position than the existing calls. This simple example demonstrates the importance of fully defining the service offering and intelligence required before call priorities are established.

Call prioritization and the effect on carrier liability is an important issue that requires Commission awareness. It is important that whatever algorithm is deployed to set call priority be understood by all involved parties. In addition, carriers should not be held responsible if a pre-defined priority algorithm requires a 911 emergency call not to connect to a serving agency in a timely manner.

IV. USER LOCATION INFORMATION

APC supports the requirement that emergency agencies require location identification in order to better handle emergency situations. At the same time, APC believes that network interworking and location technology requires

investigation and application standardization in order to achieve this goal on a uniform, consistent nationwide basis. At the current time, one of the limiting factors in the exchange of information between wireless carriers and the servicing agencies is the limitation of the existing protocol in use today (i.e., seven-digit CAMA trunking). As pointed out in various joint expert meetings, in order to provide location information, location information technology must be assessed and a determination must be made to select the technology that best suits the needs of the industry. For this reason, the standards process, with involvement from all relevant parties, is best suited to address these multiple issues. A standards-requirements document should be developed as a first task, in order to define performance standards for the wireless system, the wireline system, and the emergency service agencies.

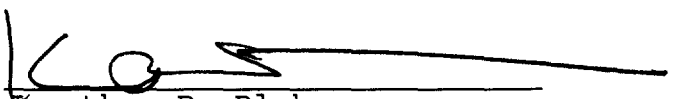
Although the Commission and its expert staff should encourage and be involved in this process, a mandatory milestone approach to this integrated system would not be appropriate. APC similarly cannot concur with the Commission's proposed approach of a three-stage implementation/deployment schedule with further investigation by the appropriate standards organizations and research and development entities. APC strongly believes that the industry will address these crucial issues in a manner that is timely and that can guarantee the most effective emergency system.

V. RE-RING CALL-BACK

APC agrees with PCIA that there are multiple technical hurdles that must be addressed and overcome before call-back capability can be implemented. As stated earlier, APC also agrees with PCIA that the Commission should not tie implementation to the effective date of an order. The industry must, and, we believe, shall, work together to implement an effective solution.

Respectfully submitted,

AMERICAN PERSONAL COMMUNICATIONS

By: 

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